

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SYED A. ALI,)	
)	
PLAINTIFF,)	Case no.: 15-cv-06178
)	
v.)	
)	
PORTFOLIO RECOVERY ASSOCIATES, LLC)	Judge Sharon Johnson Coleman
ASSOCIATES, LLC and BLITT & GAINES, P.C.)	Magistrate Judge Daniel G. Martin
and FREEDMAN ANSELMO LINDBERG, LLC)	
n/k/a ANSELMO LINDBERG OLIVER, LLC)	
)	
<u>DEFENDANTS.</u>)	
YASMEEN ALI,)	
as natural parent and best friend of SHA, a minor,)	
)	
PLAINTIFF,)	Case no.: 15-cv-11582
)	
v.)	
)	
PORTFOLIO RECOVERY ASSOCIATES, LLC,)	
and SANJAY S. JUTLA, and KEVIN J. EGAN,)	
)	
<u>DEFENDANTS.</u>)	
SYED A. ALI,)	
)	
PLAINTIFF,)	Case no.: 16-cv-01581
)	
v.)	
)	
PORTFOLIO RECOVERY ASSOCIATES, LLC,)	
and KEVIN J. EGAN,)	
)	
<u>DEFENDANTS.</u>)	
SYED A. ALI,)	
)	
PLAINTIFF,)	Case no.: 16-cv-03872
)	
v.)	
)	
PORTFOLIO RECOVERY ASSOCIATES, LLC,)	
)	
<u>DEFENDANT.</u>)	

**NOTICE OF ACCEPTANCE OF DEFENDANT PORTFOLIO RECOVERY
ASSOCIATES, LLC'S RULE 68 OFFER OF JUDGMENT AS TO COUNT IX**

Plaintiff Syed A. Ali hereby accepts Defendant Portfolio Recovery Associates, LLC's Rule 68 Offer of Judgment served on Plaintiff on November 30, 2016 via USPS regular mail and email in the amount of \$1,500.00 for Plaintiff's damages, plus reasonable attorneys' fees and costs. Said Offer of Judgment is attached hereto as Exhibit A, and Plaintiff hereby requests the Court to enter an Order of Judgment for said amount in accordance with the provisions of Federal Rule of Civil Procedure 68.

Respectfully submitted,
By /s/ Robert W. Harrer

Dated: December 14, 2016

The Law Office of Robert W. Harrer, P.C.
111 West Washington Street, Suite 1360
Chicago, IL 60602
Tel. 312-600-8466
Fax 312-610-5646
rob.harrer@harrerlaw.com

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

Please be advised that on December 14, 2016, we served copies of Plaintiff's **NOTICE OF ACCEPTANCE OF DEFENDANT PORTFOLIO RECOVERY ASSOCIATES, LLC'S RULE 68 OFFER OF JUDGMENT AS TO COUNT IX** and the instant Certificate of Service via electronically filing the foregoing documents with the Clerk of the Court using the CM/ECF system which will send notice of the same to all counsel who have appeared in this action.

By /s/ Robert W. Harrer

EXHIBIT A

EXHIBIT A

**WWWIN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SYED A. ALI,

Plaintiff,

v.

PORTFOLIO RECOVERY ASSOCIATES, LLC
and BLITT & GAINES, P.C., and FREEDMAN
ANSELMO LINDBERG, LLC n/k/a
ANSELMO LINDBERG OLIVER, LLC,

Defendants.

Case No. 1:15-cv-06178

Judge: Sharon Johnson Coleman

Magistrate Judge: Daniel G. Martin

YASMEEN ALI, as natural parent and best friend
of SHA, a minor,

Plaintiff,

v.

PORTFOLIO RECOVERY ASSOCIATES,
LLC, and SANJAY S. JUTLA, and KEVIN J.
EGAN,

Defendants.

Case No. 1:15-cv-11582

SYED A. ALI,

Plaintiff,

v.

PORTFOLIO RECOVERY ASSOCIATES,
LLC, and KEVIN J. EGAN,

Defendants.

Case No. 1:16-cv-03872

SYED A. ALI,

Plaintiff,

v.

PORTFOLIO RECOVERY ASSOCIATES,
LLC,

Defendant.

Case No. 1:16-cv-01581

DEFENDANT PORTFOLIO RECOVERY ASSOCIATES, LLC'S
RULE 68 OFFER OF JUDGMENT

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant, PORTFOLIO RECOVERY ASSOCIATES, LLC ("Defendant"), by and through their attorneys, Avanti D. Bakane and Philip T. Barrett of Gordon Rees Scully Mansukhani, LLP, hereby offers to allow judgment to be entered against it in this action, and state as follows:

1. Judgment shall be entered against Defendant in the amount of \$1,500.00 as to Plaintiff arising from Plaintiffs' claims against Defendant as alleged in Count IX of Plaintiffs' Complaint.

2. Judgment shall also be entered against Defendant for reasonable fees and costs incurred by Plaintiffs in prosecuting in Count IX of Plaintiffs' Complaint only in the above-captioned matter, pursuant to 15 U.S.C. 1692k(a)(3), as agreed to by the parties, and, in the event no agreement can be reached, to be determined by the Court.

3. This offer of judgment is inclusive of all damages, fees, and costs as to Plaintiffs' claims alleged in Count IX of Plaintiffs' Complaint only.

Dated: November 30, 2016

Respectfully submitted,

**PORTFOLIO RECOVERY ASSOCIATES,
LLC, Defendant**

Avanti D. Bakane, 6299022
Philip T. Barrett, 6317319
Gordon Rees Scully Mansukhani, LLP
One North Franklin, Suite 800
Chicago, IL 60606
Ph: 312-619-4922
Fax: 312-565-6511
abakane@gordonrees.com
pbarrett@gordonrees.com

By: /s/ Avanti D. Bakane
Avanti D. Bakane

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2016, I served, the foregoing Defendants **Defendant Portfolio Recovery Associates, LLC's Rule 68 Offer of Judgment** by via electronic and U.S. Mail, proper postage pre-paid, to all parties of record, from One North Franklin, Suite 800, Chicago, IL 60606.

Robert W. Harrer
rob.harrer@harrerlaw.com
The Law Office of Robert W. Harrer, P.C.
111 W. Washington St.,
Suite 1360
Chicago, IL 60602

Mario Kris Kasalo
mario.kasalo@kasalolaw.com
The Law Office of M. Kris Kasalo, Ltd.
20 North Clark Street
Suite 3100
Chicago, IL 60602

Thomas John Nitschke
tjohnnitschke@gmail.com
Blaise & Nitschke, P.C.
20 N. Clark St.
Suite 3100
Chicago, IL 60602

Michael L. Starzec
mike@blittandgaines.com
Blitt and Gaines, P.C.
661 Glenn Avenue
Wheeling, IL 60090

David M. Schultz
dschultz@hinshawlaw.com
Jonathon D. Drews
jdrews@hinshawlaw.com
Justin M Penn
jpenn@hinshawlaw.com
Hinshaw & Culbertson LLP
222 N. LaSalle St.
Ste. 300
Chicago, IL 60602

By: /s/ Avanti Bakane
Avanti Bakane